

Gloria Filiorum Patres

Each day, discovery.



ELTHAM COLLEGE

**Policy on Taking, Storing and Using
Images of Children**

August 2025



Version Control Information

Reason For Amendment	Name	Date	Main changes
New document	Bursar	May 2018	Prepared in response to the requirements of the General Data Protection Regulation, due to come into effect on 25 May 2018
Annual Review	Bursar	Sept 2021	No change
Annual Review	Bursar	Aug 2022	No change
Annual Review	Bursar	July 2023	No substantive change
Annual Review	Bursar	July 2024	Updated to make clear that the use of photography or filming equipment (including on mobile phones) by students in classrooms is not permitted without the express permission of the teacher
Annual Review	Bursar	August 2025	Clarified the basis of the School's legitimate interest in using images of students for relevant purposes (section 3); and the basis for parents (or students) to object to their image being used for certain purposes (section 2).

This document should be read in conjunction with the general Eltham College Privacy Notice, available on the School website.



1. This Policy

This Policy is intended to provide guidance to staff and information to students and their parents, carers or guardians (referred to in this policy as "parents") about how images of students are normally used by Eltham College ("the School"). It also covers the School's approach to the use of cameras, video and filming equipment at school events and on school premises by parents and students themselves, and the media.

It applies alongside the School's Parent Contract and should be understood in the context of any other information the School may provide from time to time about a particular use of student images, including, for example the School's policy and signage on the use of CCTV; and more general information about use of students' personal data, such as the School's Privacy Notices.

2. General Points

Certain uses of images, including student images, are necessary for the ordinary running of the School - for example for administration, identification, education and curricular purposes, and security. It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the School.

Other uses are considered to be in the legitimate interests of the School and its community and are unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the School will seek to accommodate any reasonable concerns.

We hope parents will feel able to support the school in using student images to celebrate the achievements of students; to promote the work of the School; and for important administrative purposes such as identification and security. However, for any exceptional uses of images which might be considered more intrusive or unexpected – examples of which are set out further in this Policy – we will seek specific consent from parents and, as appropriate, students. On occasions, the School may use the services of an appropriately qualified/checked professional photographer to capture high quality photographic or film images that are subsequently made available for purchase by parents – such as large drama or music productions or sports events.

Parents who accept a place for their child at the School agree to the School using images of him/her as set out in this policy under the provisions of the Parent Contract.

Any parent who wishes to limit the use of images of a student for whom they are responsible should contact the Bursar (bursar@eltham-college.org.uk). The School will respect the wishes of parents/carers (and indeed students themselves) wherever reasonably possible, and in accordance with this policy. However, parents should be aware that certain uses of their child's images may continue to be necessary, for example, for administration, education or security or will be unavoidable (for example if they are included incidentally in CCTV or as a part of a whole-school photograph).

Parents should be aware that, from around the age of 12 and upwards, the law recognises students' own rights to have a say in how their personal information is used – including images.

3. Use of Student Images in School Publications

The School will use images of its students to keep the school community updated on the activities of the School, and for marketing and promotional purposes, including:

- on internal displays and notice boards within the school premises



- as part of the school's email system and intranet, and in appropriate communications by whatever means with the school community (parents, students, staff, Governors and alumni)
- as part of school curricular activities, for example in sport, music or drama, or as a teaching aid and as part of official activities using school devices, tablets and applications
- in school magazines, marketing materials (including the school's prospectus) whether in printed form or online
- on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels
- exceptionally, in the press and other external advertisements for the school.

The school's policy in respect of the above uses is as follows:

- **Legitimate interests** will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include via internal school or parent communications, the school website and school social media channels, on the intranet, in other closed community groups, in digital or printed school magazines or prospectus, or other similar means.

The key effect of the School relying on legitimate interests is that parents and students may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the School, but objections can be overridden by other factors: for example, uses which the School considers essential; or uses which create little or no risk of harm (including where children are not at significant risk of outside identification).

- **Consent** will be sought for any unusual or exceptional external uses of student images online. In particular, where any intended use is more intrusive or unexpected such as if an individual child is the focus of a section of the website, social media post or other external media (for example, through personal academic, sporting or musical achievement) other than for one-off occasions. In such exceptional circumstances, the school will discuss the use with the student or parents (as appropriate) in advance and seek specific, ad hoc consent.

The School will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a student or their family should be drawn to the School's attention in advance. The safeguarding and best interests of students will remain the school's priorities at all times.

The School will only use images of students in suitable dress and the images will be stored securely.

4. Use of Student Images for Identification and Security

All students are photographed on joining the School and then additionally at Year 9 and Year 12, for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group. The images are held on the School's information management system and are accessible by teaching, pastoral and administrative staff with the relevant permissions (see below).

CCTV is in use on school premises and will capture images of students. Images captured on the School's CCTV system are used in accordance with the School's Privacy Notice and CCTV Policy, as amended from time to time.



5. Use of Student Images by External Media

Where practicably possible, the School will notify parents in advance when the media is expected to attend (or report on) an event or school activity in which students are participating, and will make every reasonable effort to ensure that any student whose parent or carer has refused permission for images of that student, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

The media may request the names of the relevant students to go alongside the images. It is not the School's policy to provide full names in this scenario, and these will only be provided where parents have been informed and either parent or student has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

6. Security of Student Images

Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The School uses only reputable professional photographers and makes every effort to ensure that any images of students are in suitable dress and held by such persons securely, responsibly and in accordance with the School's instructions and wider data protection regulations.

The School takes appropriate technical and organisational security measures to ensure that images of students held by the school are kept securely on school systems and protected from loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of students held by the School where it is necessary for them to do so.

Any external processors of student images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.

All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Students, and on the importance of ensuring that images of students are made and used responsibly, only for school purposes, and in accordance with wider school policies and the law.

7. Use of Cameras and Filming Equipment (including mobile phones and tablets) by Parents

Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the School expects all parents to follow:

- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions, and so should not be used at indoor events.
- Parents are asked not to take photographs of other students, except incidentally as part of a group shot, without the prior agreement of that student's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other students should not be made accessible to others online (for example on Facebook, Instagram or by text or WhatsApp or other similar platforms), or published in any other way.



- Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School will always print a reminder in the programme of events where issues of copyright apply.
- Parents may not film or take photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset students by reference to their dress or activity or any other factor.

The school reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), either from all attendees / parents (e.g. where a safeguarding risk to an individual child has been identified, or from any individual parent who does not follow these guidelines or is otherwise reasonably felt to be making inappropriate images.

The School sometimes records plays, concerts or sporting events professionally (or engages a professional photographer or film company to do so), in which case physical or digital copies may be made available to parents for purchase. Parents of students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely outside of the school community.

8. Use of Cameras and Filming Equipment by Students

All students are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.

The use of cameras or filming equipment (including on mobile phones) is never allowed in toilets, washing or changing areas, nor should photography or filming equipment (including on mobile phones) be used by students in classrooms without the express permission of the teacher. Cameras or filming equipment (including on mobile phones) must not be used in a manner that may offend or cause upset.

The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School's Anti-Bullying Policies, Data Protection Policies, e-Safety Policy, Acceptable Use IT Policy for Students, Safeguarding Policy or the School Constitution (School Rules) is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.